

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233



Carol S.
Thomas C. Jorling
Commissioner

December 13, 1993

Mr. Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Dear Mr. Bellina:

RE: NWIRP - BETHPAGE
SITE NUMBER 130003B

This is in response to your agency's comments on the Feasibility Study Report which was prepared by the US Navy for the above-referenced site. Before addressing your comments, I want to point out that the Department has not agreed to the approach the Navy has developed to remediate the groundwater contamination.

The Department intends to issue a Record of Decision (ROD) regarding the above-referenced site on or before March 31, 1994 in which on-site source-control measures will be set forth. Specifically, the following items will be incorporated into this ROD:

- 1 - vacuum extraction of VOCs in soils at Site 1 and under the eastern end of Plant 3
- 2 - removal of PCBs in soil
- 3 - removal of arsenic-contaminated soils
- 4 - financing of a treatment system at Bethpage Water District (BWD) Plant #5
- 5 - improvements at BWD's Adams Avenue Plant (optional)
- 6 - pumping and treating groundwater (DNAPL) at and around monitoring well HN-24I

The groundwater issues will be tabled and combined with the Grumman on-site ROD much as you suggested in your comments. It should be noted that, as lead agency in this matter, the Navy may choose to go their own way. The Navy does not intend to deal with the groundwater remediation for three years; however, we hope that they will go along with the Department's approach in this matter.

Most of your comments have already been addressed in the above text. In addition, we offer the following responses to specific comments contained in your letter:



- 1 - Comment A.1.a: The Navy investigated its site and the residential area east of the site. Grumman is investigating its site as well as areas hydraulically downgradient of the two sites. Therefore, these sites are being adequately addressed by both parties.

In order to avoid duplication of efforts, the Navy did not investigate areas to the south of their property because that was being covered by Grumman. The Navy has verbally agreed to collect additional soil samples off of its property in the residential area, primarily looking for PCBs.

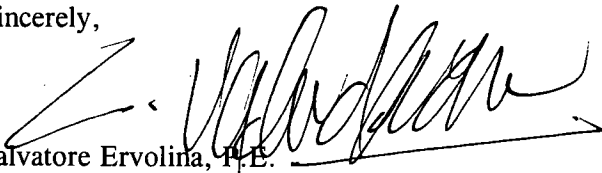
- 2 - Comment A.2.b: The methodology used by the Navy in developing soil clean-up goals for VOCs is consistent with the Department's TAGM #4046. Since the Navy's values are lower than those given in the TAGM; the Department has given the Navy the option of using the clean-up goals given in the TAGM.
- 3 - Comment A.3.a: The EPA is referred to Appendix H of the May 1992 RI report for the analytical data pertaining to Tentatively Identified Compounds (TICs). Based on its review of this data, the Department requested that the Navy conduct a sampling effort to determine the nature and extent of PCB contamination in on-site soils.
- 4 - Comment A.3.b: The soils below the recharge basins were investigated by both direct and indirect methods. Sediment samples were collected in two of the basins, a two-level soil-gas survey was conducted around the basins and three (3) monitoring wells screened across the water table were installed near the basins. It was concluded that the recharge basins are, at most, only a very minor source area for VOCs. In the opinion of the Department, no further action is required with respect to the recharge basins. However, other areas of Site 2, specifically the former sludge drying beds area, still require remediation.
- 5 - Comment A.5: Deed restrictions are voluntary with respect to the PRPs or landowners, and have been incorporated into RODs issued by the State of New York. The State has not demanded that the Navy institute deed restrictions. (NOTE: Per the Department's Hazardous Waste regulations, 6NYCRR Part 373-2.7, a notice in deeds regarding restrictive uses of properties is required.)
- 6 - Comment A.6: The Navy's groundwater model is better than some of the previous models developed for the Bethpage area. In the opinion of the Department, the best available model is the one developed by the USGS and this model would be a valuable tool in developing groundwater management programs for this area. The Department again requests the assistance of EPA to help us gain access to the USGS model.
- 7 - Comment A.8: It is not clear what is meant by "interim measures to contain the contamination." Please provide any specific proposals for IRMs that the EPA may have.
- 8 - Comment B.7: NYSDOH drinking water standards are the effluent standards that apply in this case.

Mr. Andrew Bellina, P.E.

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If you have any questions regarding this matter, please feel free to contact Mr. John Barnes, P.E., of my staff, at (518) 457-3395.

Sincerely,

for 

Salvatore Ervolina, P.E.
Director
Bureau of Eastern Remedial Action
Div. of Hazardous Waste Remediation

JB/dd
nwirp17

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